

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHAPTER 13 NO.:

TOMMY BELL, JR. AND
TABITHA VAUGHN BELL

25-00857 - JAW

TRUSTEE'S NOTICE AND MOTION TO MODIFY

COMES NOW Harold J. Barkley, Jr, the duly appointed and qualified Standing Trustee in the above cause and moves to modify the above proceeding for reasons to be shown below.

1. The Debtors' Chapter 13 Plan was confirmed by Order of this Court entered on June 10, 2025.

2. That, on August 6, 2025, Lakeview Loan Servicing, LLC filed a Notice of Post-petition Mortgage Fees, Expenses, and Charges (DK # 30) in the amount of \$275.00 for Bankruptcy /Proof of Claim fees incurred May 29, 2025, and \$75.00 for Plan Review incurred April 8, 2025, for a total of \$350.00.

3. Therefore, the Debtors' Plan should be modified to pay Creditor Lakeview Loan Servicing, LLC for the Post-petition Mortgage Fees, Expenses and Charges in the amount of \$350.00 over the life of the Debtors' Plan.

4. That, the Debtors' wage deduction order should be amended as necessary to comply with the terms of this Motion.

5. The indebtedness of those creditors, not timely filing proof of claims, should be paid \$0.00, and said indebtedness should be discharged upon completion of this plan.

6. **You are hereby notified** that all Objections must be made in writing to the Clerk of this Court. Attorneys and Registered Users of the Electronic Case Filing (ECF) system should file any response using ECF. Others should file any response at U. S. Bankruptcy Court, U. S. Courthouse, 501 East Court Street, Suite 2.300, Jackson, MS 39201, with a copy mailed to the Trustee at the address below.

7. **You are further notified** that all Objections must be made within thirty (30) days of this date, being **September 8, 2025.**

8. **You are further notified** that should no Objection be timely filed, the Court will be requested to enter an Order ex parte.

9. Other grounds to be shown at a hearing hereon.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this motion be received and filed, and at a hearing hereon this Honorable Court will enter its Order sustaining Trustee's Motion to Modify,

and for such other, further and general relief to which the Trustee and this bankrupt estate may be entitled.

Dated: August 7, 2025

Respectfully submitted,

/s/ Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR. - MSB #2008
CHAPTER 13 TRUSTEE
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C E R T I F I C A T E

I, Harold J. Barkley, Jr., Trustee, do hereby certify that I have this date mailed a true and correct copy of the foregoing pleading to the following parties by United States Mail, postage prepaid or by ECF Filing Notification:

Office of the U S Trustee
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Hon. Thomas Carl Rollins, Jr.
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Tommy Bell, Jr.
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Virginia Beach, VA 23452

LoanCare, LLC
PO Box 8068
Virginia Beach, VA 23450

Dated: August 7, 2025

/s/ Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR.